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| <input checked="" type="checkbox"/> Qwest | | | | | |
| <input checked="" type="checkbox"/> Home | | <input checked="" type="checkbox"/> Residential | | <input checked="" type="checkbox"/> Small Business | |
| <input checked="" type="checkbox"/> Large Business | | <input checked="" type="checkbox"/> Partners | | | |
| <input checked="" type="checkbox"/> Products and Services | | <input checked="" type="checkbox"/> Resource | | <input checked="" type="checkbox"/> Systems | |
| <input checked="" type="checkbox"/> Network Support | | <input checked="" type="checkbox"/> Training and Notices | | <input checked="" type="checkbox"/> Customer Service | |
| <input checked="" type="checkbox"/> Wholesale | | | | | |

Training & Notices**Customer Training****Training**☐ [Course Catalog](#)☐ [Course Schedule & Registration](#)☐ [Course Feedback](#)**Loop Qualification and Raw Loop Data - CLEC Job Aid****Job Aid Description/Purpose**

This job aid is designed to provide the CLEC guidance in the appropriate use of IMA Loop Qualification Tools, the IMA Raw Loop Data Tool, and the Wire Center Raw Loop Data Tool for Loop Qualifications. This job aid may also be used as a guide for the qualification of DSL. The tools described in this job aid support the pre-order functions for 2/4 wire non-loaded loops, Asymmetrical Digital Subscriber Loop (ADSL) compatible loops, Integrated Switched Digital Network (ISDN) Basic Rate Interface (BRI) capable loops, xDSL-I capable loops, Line Sharing, Line Splitting, Loop Splitting, and Shared Distribution Loops.

Note: This job aid does not contain information for HICAP Service requests or Design Service requests (see the IMA User's Guide).

Objectives

While using this job aid you should be able to:

- Describe the terms of Facility Availability, Loop Qualification and Raw Loop Data
- Describe the likes and differences of Loop Qualifications and Raw Loop Data queries
- Navigate the IMA Loop Qualification tools, and Raw Loop Data tools
- Obtain Raw Loop Data from the Wire Center and IMA Raw Loop Data Tools

Prerequisites

- Qwest 101 "Doing Business with Qwest"
- Basic Telephony course and/or equivalent industry experience
- Working knowledge of Qwest IMA EDI/GUI ordering system
- A CLEC end-user must have telecommunication engineering knowledge to interpret the significance of raw loop data

Audience

The target audience for this job aid is primarily CLECs and External Customers.

How to Obtain

It is not necessary to register to obtain and use this job aid. The training course catalog is available to External Customers and CLECs on the [Qwest Wholesale Markets Customer Training Web site](#).

To obtain this job aid, scroll through the Course Catalog until you find the listing "Loop Qualification and Raw Loop Data-CLEC Job Aid". Click the link "Click Here to Download".

For product specific information view the [Wholesale Markets Web site](#).

If you have any questions regarding the use of this job aid, please call your Service Manager. If you have questions on the content please contact Michelle Thacker of Wholesale Markets at 303-382-5725, or email your comments using to the following email address, mthacke@qwest.com.

This Course Last Updated: May 30, 2003

This Page Last Updated: October 31, 2003



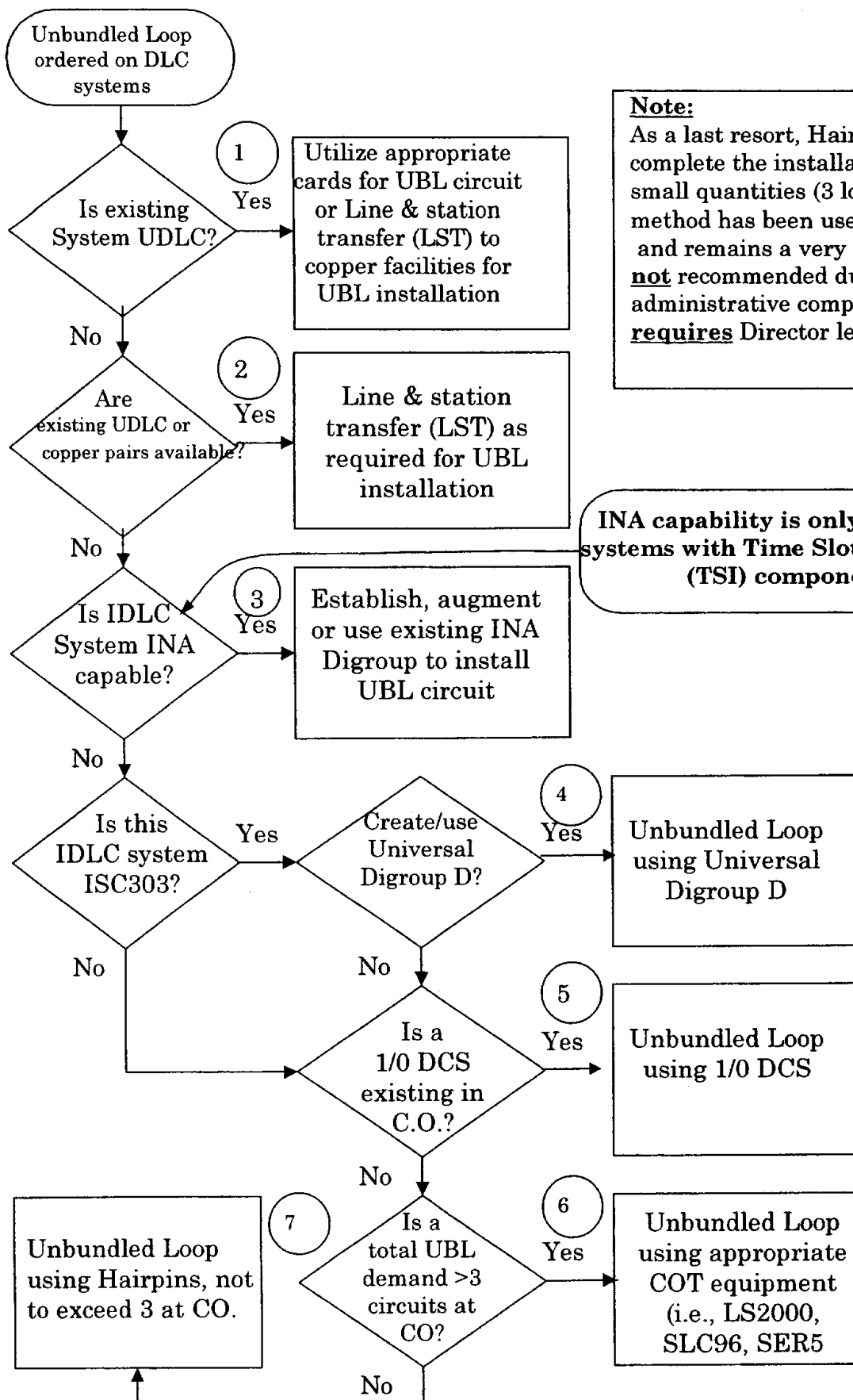
EXHIBIT DP-9

| RLD Request | GUI SUCCESS | GUI FAILURE | EDI SUCCESS | EDI FAILURE | TOTAL |
|-------------|-------------|-------------|-------------|-------------|--------|
| Oct'03 | 9225 | 3241 | 0 | 0 | 12466 |
| Nov'03 | 6450 | 2811 | 0 | 0 | 9261 |
| Dec'03 | 7250 | 2870 | 1 | 0 | 10121 |
| Jan'04 | 6787 | 2660 | 0 | 0 | 9447 |
| Feb'04 | 7188 | 2454 | 0 | 0 | 9642 |
| Mar'04 | 8008 | 2930 | 0 | 0 | 10938 |
| Apr'04 | 5754 | 2698 | 6 | 2 | 8460 |
| May'04 | 5026 | 2666 | 0 | 0 | 7692 |
| June'04 | 5077 | 2443 | 0 | 0 | 7520 |
| July'04 | 5169 | 2432 | 0 | 0 | 7601 |
| Aug'04 | 5933 | 2708 | 0 | 0 | 8641 |
| Sep'04 | 6706 | 2702 | 0 | 0 | 9408 |
| Total | 78573 | 32615 | 7 | 2 | 111197 |

EXHIBIT DP-10

**Exhibit DP-10 has been submitted pursuant to the Protective Order in
CC Docket No. 01-338 and WC Docket No. 04-313**

EXHIBIT DP-11



Note:

As a last resort, Hairpins can be used to complete the installation of UBLs in very small quantities (3 loops or less). This method has been used by Qwest in the past and remains a very difficult method, although **not** recommended due to several severe administrative complications. Use of Hairpins **requires** Director level approval to proceed.

INA capability is only possible in systems with Time Slot Interchange (TSI) components.

Note:

Manufacture Discontinued (MD) COT equipment should be obtained from Reuse stock

EXHIBIT DP-11.1

Legend for IDLC Flow

Solution provisioning intervals:

- 1) UBL circuit cards – 5 days
LST – 5 days**
- 2) LST – 5 days**
- 3) INA Digroup (D4 Channel Bank, dedicated DS1) – 5 days if span capacity**
- 4) Order COT – 90 days – 120 days**
- 5) 1/0 DCS (Adtran BR110) - 90 days – 120 days**
- 6) LS 2000, SLC 96, Series 5 - 90 days – 120 days**
- 7) Hairpin – 15 days after approval**

EXHIBIT DP-12

Exhibit No. ____ (LB-2HC)
Docket No. UT-033044
January 23, 2004

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**In the Matter of the Petition of Qwest
Corporation to Initiate a Mass-Market
Switching and Dedicated Transport Case
Pursuant to the Triennial Review Order**

Docket No. UT-033044

Report of Lorraine Barrick

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| Exhibit 3 | Locations Visited |
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1. Executive Summary

I am a certified public accountant. I have been engaged in business and financial consulting since 1988. I have extensive experience in assisting companies in the telecommunications industry.

I was retained by Qwest Corporation (Qwest) through Hitachi Consulting to review and test its processes and procedures pertaining to the Batch Hot Cut (BHC) processes defined below. I was assisted in my work by a team of telecommunications and process consultants from Hitachi Consulting. This report summarizes the work performed by me, or under my supervision, and my opinions resulting from this work.

Our work included the following:

- Gaining an understanding of the existing hot cut process;
- Studying Qwest's hot cut performance to date;
- Reviewing the proposed BHC process, as well as public CLEC comments and concerns regarding that process;
- Making recommendations for process improvements;
- Comparing the current hot cut process to the proposed BHC process;
- Developing a testing plan to be used to judge the quality and efficiency of the proposed BHC process; and,
- Testing the BHC process.

Qwest has demonstrated, based on historical data for the existing hot cut process, that it can handle large volumes of UNE-P to UNE-Loop conversion requests. Qwest has demonstrated, on many occasions, the ability to process more than 1,000 hot cut requests in a day. Qwest has also demonstrated the capability to consistently perform between 25 and

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1 100 hot cuts per day per central office (CO) and to exceed these amounts when required,
2 with 30-day trouble rates of less than 1%.

3

4 Qwest has serviced the above volumes using the existing hot cut process. Currently, Qwest
5 processes hot cuts individually on a first in, first out basis. The proposed BHC process will
6 implement significant improvements that will enable increased efficiencies, seamless service
7 and enhanced scalability as compared to the existing hot cut process.

8

9 The BHC process was created to make the hot cut process described above more scalable
10 and efficient for larger volumes of hot cuts. The process groups multiple service orders for
11 hot cuts into "batches." A CLEC will be required to submit a minimum of 25 lines and a
12 maximum of 100 lines to create a batch. Significant efficiencies over the hot cut process are
13 created through front-end edit checks, process automation and streamlining of manual
14 processes. We have measured the benefit of several of these differences. The results
15 indicate that the process is substantially faster than the current process and the differences
16 we measured save many hours per day at the projected volumes.

17

18 We also tested Qwest's proposed BHC process with live trials using CLEC customers. Our
19 testing to date has included four batches of approximately 25 telephone numbers per batch.
20 In all cases, Qwest met 100% of its installation commitments, and no troubles were reported
21 for the preliminary live trial within the first 30 days. (The second two batches were cut within
22 a week of issuance of this report and, therefore, 30-day trouble report data is not available for
23 the second two batches.) As stated, Qwest met 100% of its installation commitments, which
24 exceeds the FCC's 90% on-time hot cut performance standard set forth in its Bell Atlantic
25 Section 271 decision. In fact, Qwest has demonstrated an ability to consistently meet and
26 exceed this benchmark.

27

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1 Extrapolation of the Due Date activities of the COs for each of the live trials indicates that a
2 team of two technicians should be able to complete them in the course of an eight-hour shift.
3 Any remaining time in the shift, plus other shifts, could be used to conduct pre-wire activity for
4 other batches.

5
6 To scale to the Qwest forecasted volumes, additional resources will be required. Each of the
7 key departments have plans to scale as required. We have discussed these plans with
8 department management and nothing has come to our attention to suggest that they are
9 unreasonable.

10
11 In my opinion, based on the above, the BHC process as proposed represents significant
12 improvements in efficiency with acceptable levels of quality when compared to the existing
13 hot cut process. Nothing has come to my attention to suggest that this process will not scale
14 to the forecasted volumes.

16 2. Introduction

17 I am a certified public accountant. I have been engaged in business and financial consulting
18 since 1988. Prior to that, I was an auditor for three years. My work experience includes
19 nearly 15 years at the public accounting and consulting firm of Arthur Andersen, LLP. When I
20 left Arthur Andersen in May of 2000, I was a partner in the Consulting Division of the Seattle
21 office. I have extensive experience in assisting companies in the telecommunications
22 industry. My resume is attached as Exhibit 1.

23
24 I was retained by Qwest through Hitachi Consulting to review and test its processes and
25 procedures pertaining to the BHC processes defined below. I was assisted in my work by a
26 team of telecommunications and process consultants from Hitachi Consulting. This report

Report of Lorraine Barrick

1 summarizes the work performed by me, or under my supervision, and my opinions resulting
2 from this work.

3

4 This report assumes the reader's familiarity with the hot cut process and related subject
5 matter. A glossary of terms and acronyms used in this report is provided in Exhibit 2.

6

7 During the course of our test work, we obtained information from electronic databases and
8 other Qwest systems that was captured in the course of Qwest operations. The scope of this
9 engagement was not to conduct an audit of any of this information under the Generally
10 Accepted Auditing Standards of the American Institute of Certified Public Accountants. We
11 relied on this information as discussed below.

12

13 Certain information and assumptions were provided to us by Qwest. Any such information
14 upon which we relied is documented in the relevant report section.

15

16 I reserve the right to change my opinion due to any new information that becomes available
17 to me.

18

19 This report was prepared for the above-referenced matter and should not be used or referred
20 to for any other purpose.

21

22 **3. Background**

23 The Federal Communications Commission (FCC), in its September 26, 2003, Triennial
24 Review Order (TRO), required any Incumbent Local Exchange Carrier (ILEC) seeking to
25 rebut the FCC's national presumption that Competitive Local Exchange Carriers (CLECs) are
26 impaired without access to unbundled switching in mass markets to establish a "batch hot cut

process” for CLECs. Pursuant to that Order, Qwest petitioned many of the state commissions within its 14-state region to open such a docket.

The FCC found that a “seamless, low-cost batch hot cut process for migrating mass market customers from one carrier to another is necessary, at a minimum, for carriers to compete effectively in the mass market.”¹

In conjunction with Qwest’s petition to rebut the presumption of impairment, Qwest engaged Hitachi Consulting to review and test its BHC process, to provide recommendations for process improvement, and to determine whether, in my opinion, Qwest will be able to perform the required number of hot cuts per CO per day necessary to both serve future demand and migrate CLECs’ embedded base of Unbundled Network Element Platform (UNE-P) clients to Unbundled Network Element Loop (UNE-Loop), at an acceptable quality level.

4. The Scope of Work

Our work included the following:

- Gaining an understanding of the existing hot cut process;
- Studying Qwest’s hot cut performance to date;
- Reviewing the proposed BHC process, as well as public CLEC comments and concerns regarding that process;
- Making recommendations for process improvements;
- Comparing the current hot cut process to the proposed BHC process;
- Developing a testing plan to be used to judge the quality and efficiency of the proposed BHC process; and,
- Testing the BHC process.

¹ TRO paragraph 487.

1 During the course of our work, we visited 10 COs, the Qwest CLEC Coordination Center
2 (QCCC), two Loop Provisioning Centers (LPCs), Design Services and two of the three
3 Service Delivery Centers. We observed both the existing hot cut process and the proposed
4 BHC process. We discussed the process and resource requirements with personnel at
5 various locations. The sites we visited are included in Exhibit 3. The people we interviewed
6 are identified in Exhibit 4.

7

8 **5. Overview of the Current Hot Cut Process**

9 Currently, Qwest processes hot cuts individually on a first in, first out basis. The hot cut
10 process consists of three basic activities: (a) order creation and acceptance, (b) planning and
11 pre-wire (Designed, Verified and Assigned Date or DVA) and (c) cut over (Due Date). These
12 activities are performed discretely for each requested hot cut. Local Service Requests
13 (LSRs) are issued by the CLEC to initiate the hot cut for a particular line. Qwest's Service
14 Delivery Centers convert these LSRs into service orders to be provisioned in the network.
15 The LSRs are submitted in two ways; through the Interconnect Mediated Access (IMA)
16 system (submitted through GUI or EDI), or through facsimile. The majority of LSRs are
17 received in IMA and are processed through the automated systems in the Service Delivery
18 Centers.

19

20 The service orders are processed and reviewed by two additional departments' automated
21 systems to ensure the line can be cut over as requested by the CLEC. The LPC verifies the
22 loop to the customer premises and Design Services checks the quality of the loop and
23 designs the circuit. These steps are typically completed within one day of the LSR submittal.

24

25 Once a service order is created and accepted, Qwest prepares for the hot cut in the days
26 prior to the Due Date. The QCCC is responsible for scheduling, provisioning and assembling
27 work orders to execute the hot cuts for the inside plant on Due Date. The Central Office

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1 Technician (COT) "pre-wires" the hot cut by installing cross-connects and jumpers between
2 the Interconnect Distribution Frame (ICDF) and the Main Distribution Frame (MDF) inside the
3 CO. This wiring will remain in place, but unused, until the hot cut Due Date. These steps
4 occur between days two and three of the process.

5

6 On Due Date, the COT performs the hot cut to transfer service from Qwest's switch to the
7 CLEC's switching equipment. The COT first performs a dial tone and Automatic Number
8 Identification (ANI) test on the loop terminating on the CLEC switch and the Qwest switch. If
9 all tests are successful, the COT performs the "lift and lay" to transfer service to the CLEC
10 switch facility. The COT subsequently performs the same dial tone and ANI tests at the
11 protector frame to ensure the hot cut was successful. Once cut over activity is complete on
12 the CO floor, the COT notifies the QCCC that the cut is completed and closes the work order
13 in Qwest's work management system. The QCCC contacts the CLEC with notification of the
14 completed cut. The CLEC is required to reject the hot cut within two hours of completion of
15 the hot cut. If no cuts are rejected, the COT removes the hot cut jumpers from the MDF to
16 the Qwest switch.

17

18 **6. Overview of the Batch Hot Cut Process**

19 ***As Planned***

20 Qwest's BHC design process has been an iterative one. On December 1, 2003, Qwest
21 proposed a BHC process to the CLECs. This process was revised and refined based on the
22 following:

- 23 • Qwest's internal study of the proposed process;
- 24 • CLEC input: two multi-day forums were held by Qwest to elicit CLEC comments on
25 the proposed process; and,
- 26 • Hitachi Consulting input.

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1 The BHC was created to make the hot cut process described above more scalable and
2 efficient for larger volumes of hot cuts. The process is based on grouping multiple service
3 orders for hot cuts into "batches." A CLEC will be required to submit a minimum of 25 lines
4 and a maximum of 100 lines to create a batch. (These batches will be assembled by the
5 QCCC after LSR submission and acceptance.) The COTs will pre-wire lines and perform
6 dial-tone and ANI tests three or four days before Due Date, using a 7-day standard interval.
7 If there is no dial-tone or the incorrect ANI is detected, the CLEC will have until Due Date to
8 correct any CLEC-side issues. On Due Date, COTs will work to cut up to 100 lines between
9 3:00 am and 11:00 am local time. The CLEC can monitor the status of the project through an
10 online order status tool, or trap and trace capability. The CLEC is required to reject the hot
11 cut within two hours after the BHC is complete. If no cuts are rejected, the COT will remove
12 the hot cut jumpers from the MDF to the Qwest switch. The BHC process is documented in
13 Exhibit 5. As with the hot cut process, the CLEC will have the opportunity to accept or reject
14 any of the hot cuts.

15
16 Hitachi Consulting made several process improvement recommendations over the course of
17 our engagement. All of the material process improvement recommendations made by Hitachi
18 Consulting have been addressed to our satisfaction. One example of the recommendations
19 that have been incorporated in the proposed BHC process is requiring CLECs to submit BHC
20 LSRs via the IMA system with the option to fax the order in the event of system outages.

21 ***Key Process Differences***

22 In order to gain efficiencies and allow for greater volume, the BHC process will differ from the
23 hot cut process in various ways. The most significant differences are discussed below and
24 are identified in Exhibit 5.

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1 **Order Creation and Acceptance**

- 2 • Significant interactive edits will be built into the IMA system to identify the LSRs
3 tagged for the BHC process and to ensure the reduction of input errors, which then
4 require additional manual handling by both Qwest and the CLEC.
- 5 • Qwest will require that all LSRs submitted for the BHC process must be sent through
6 IMA (GUI or EDI) and faxes will only be allowed when the above systems are
7 unavailable. BHC LSRs will not have the option to be marked for "Manual Handling"
8 by the CLEC thereby, enabling them to flow-through to the Service Order Processor
9 (SOP) electronically.

10 **Planning and Pre-wire (DVA)**

- 11 • An automated sort engine filters out the BHC service orders and assembles batches
12 based on CLEC and CO.
- 13 • Multiple work documents, sorted by the location of the jumpers on each frame, are
14 automatically created for the COTs. The documents are organized to maximize
15 efficient wiring procedures in the CO.
- 16 • Creation of an automated sort engine to input the wiring information into the
17 spreadsheets used by the COTs.

18 **Cut Over**

- 19 • An online order status notification tool will be created. The CLEC will have the ability
20 to monitor the tool for updates as its own processes dictate.
- 21 • The CLEC will not be given time to correct an incorrect dial tone or ANI test problem
22 on Due Date. If there is an issue with CLEC dial tone or ANI on Due Date, the line
23 will be assigned a Jeopardy status using the online order status tool and the line will
24 be removed from the batch.
- 25 • QCCC updates in WFA-C as well as CO updates in FOMS/TIRKS are no longer
26 manual processes. These processes have been automated.

- 1 • CLECs will also have the option to enable trap and trace functionality in their
2 switches. When Qwest initiates the ANI test, the CLEC will be notified via trap and
3 trace of the test, signifying the BHC has begun.

4 ***As Tested***

5 Some of the planned process improvements will require significant time and resources from
6 Qwest to develop. Therefore, they could not be completed in time for our testing. Principal
7 process improvements not available at the time of our testing include:

- 8 • Interactive edits added to the IMA;
9 • Creation of an online order status notification tool;
10 • Use of trap and trace capabilities inherent in the CLEC's switch; and,
11 • Automated updates to various Qwest's systems.

12

13 A complete list of the components of the process, not yet available as of the date of our
14 testing, is included in Exhibit 6.

15

16 The process improvements not available for testing will serve to expedite the process and
17 create additional efficiencies. Therefore, actual performance should be better than that
18 experienced in our testing.

19

20 **7. Assumptions Regarding Batch Hot Cut Process**

21 According to Qwest management, the following services are eligible for the BHC process:

- 22 • UNE-P to UNE-Loop;
23 • Retail to UNE-Loop;
24 • UNE-Loop to UNE-Loop (CLEC to CLEC);
25 • UNE-P to UNE-Loop (CLEC to CLEC);

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- 1 • Resale to UNE-Loop; and,
- 2 • Centrex to UNE-Loop.

3

4 The following services are excluded, although the traditional hot cut process will be available
5 for these services:

- 6 • IDLC;
- 7 • Line Splitting;
- 8 • Line Sharing;
- 9 • Lines with Conditioning;
- 10 • Remote Serving Offices (EX cables);
- 11 • Extended Electronic Loops;
- 12 • Requests with Coordination; and,
- 13 • CLEC to ILEC.

14

15 We have also been informed that the maximum number of BHCs per day, in any given CO,
16 will be 100 lines (plus all regular hot cuts).

17

18 In addition, we received information from Qwest concerning embedded base, growth and
19 historical and future volumes. This information is discussed in the section of this report titled
20 "Qwest Historical Hot Cut Volumes and Volume Forecast." We have relied on these
21 assumptions and structured our testing accordingly.

22